

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. PAUL M. CONTI,

Plaintiff-Counterclaim Defendant,

Case No. 17-CV-9268 (VEC)

– against –

JOHN DOE,

Defendant-Counterclaim Plaintiff.

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REPLY DECLARATION OF G. WILLIAM BARTHOLOMEW

G. WILLIAM BARTHOLOMEW, hereby declares under penalty of perjury:

1. I am associated with the law firm of Judd Burstein, P.C., attorneys for Plaintiff-Counterclaim Defendant Dr. Paul M. Conti in the above-captioned action.

2. I respectfully submit this Reply Declaration in further support of Dr. Conti's motion for an Order (i) pursuant to Rules 401, 403, and 702 of the Federal Rules of Evidence, excluding the expert reports and testimony of Dr. Paul S. Appelbaum and Dr. Ziv E. Cohen proffered by Defendant-Counterclaim Plaintiff John Doe; and (ii) granting such other and further relief as this Court deems just and proper.

3. Annexed hereto as Exhibit A are relevant excerpts of the transcript of Dr. Appelbaum's deposition, held January 21, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2020, in the Commonwealth of Pennsylvania, County of Lancaster.

/s/ G. William Bartholomew
G. WILLIAM BARTHOLOMEW